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September 10, 1996

Eddie Roberson
Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

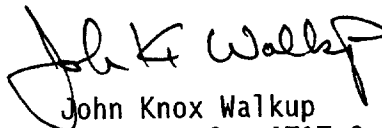
Re: Application of United Telephone-Southeast, Inc.
for Certificate of Public Convenience and Necessity
to Provide InterLATA Interexchange Telephone Service
-- Docket No. 96-01235

Dear Mr. Roberson:

Enclosed for filing in the above-styled docket is the testimony of Richard Guepe on behalf of AT&T of the South Central States, Inc. This is filed pursuant to a Notice dated August 22, 1996 in this proceeding. Copies of this testimony have been served upon all interested parties.

I appreciate your attention to this matter.

Sincerely,



John Knox Walkup
Attorney for AT&T Communications
of the South Central States, Inc.

JKW:ka
Enclosure

cc: James B. Wright, Esq.
Dianne F. Neal, Esq.

1 **AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.**

2 **TESTIMONY OF RICHARD GUEPE**

3 **BEFORE THE TENNESSEE REGULATORY AUTHORITY**

4 **DOCKET NO. 96-01235**

5 **SEPTEMBER 10, 1996**

6
7 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TITLE.**

8
9 A. My name is Richard Guepe and my business address is 1200 Peachtree
10 Street, N.E., Atlanta, Georgia 30309. I am employed by AT&T as a
11 District Manager in the Law & Government Affairs organization.
12

13 **Q. BRIEFLY OUTLINE YOUR EDUCATIONAL BACKGROUND AND**
14 **BUSINESS EXPERIENCE IN THE TELECOMMUNICATIONS**
15 **INDUSTRY.**
16

17 A. I received a Bachelor of Science Degree in Metallurgical Engineering in
18 1968 from the University of Notre Dame in South Bend, Indiana. I
19 received a Masters of Business Administration Degree in 1973 from the
20 University of Tennessee in Knoxville, Tennessee. My
21 telecommunications career began in 1973 with South Central Bell
22 Telephone Company in Maryville, Tennessee, as an outside plant
23 engineer. During my tenure with South Central Bell, I held various
24 assignments in outside plant engineering, buildings and real estate,
25 investment separations and division of revenues. At divestiture (1/1/84),
26 I transferred to AT&T where I have held numerous management

1 positions in Atlanta, Georgia, and Basking Ridge, New Jersey, with
2 responsibilities for investment separations, analysis of access charges
3 and tariffs, training development, financial analysis and budgeting,
4 strategic planning, regulatory issues management, product
5 implementation, strategic pricing, and docket management.

6

7 **Q. PLEASE STATE THE PURPOSE OF YOUR TESTIMONY.**

8

9 A. The purpose of my testimony is to request the Tennessee Regulatory
10 Authority to ensure Sprint United complies with the provisions of the
11 Federal Telecommunications Act of 1996 ("The Act") concerning dialing
12 parity and with applicable Tennessee statutes. Specifically, AT&T
13 requests the Tennessee Regulatory Authority to direct Sprint United to
14 implement 1+ intraLATA presubscription in its exchanges in Tennessee.

15

16 **Q. WHY IS THIS NECESSARY?**

17

18 A. AT&T has requested Sprint United to implement intraLATA
19 presubscription; however, Sprint United has not set a presubscription
20 schedule. Sprint United also now petitions the Tennessee Regulatory
21 Authority to authorize it to provide interLATA interexchange telephone
22 services. IntraLATA presubscription is required by the Federal
23 Telecommunications Act of 1996 and Tennessee law and will give

1 consumers a choice of their intraLATA toll carrier. Today all 1+
2 intraLATA traffic is carried by Sprint United. Customers are denied a
3 choice of providers.

4

5 **Q. HOW DOES THE FEDERAL TELECOMMUNICATIONS ACT OF**
6 **1996 ADDRESS PRESUBSCRIPTION?**

7

8 A. Under Section 251(b) (3) of the Act, each local exchange company has the
9 duty to provide dialing parity to competing providers of telephone
10 exchange service and telephone toll service. This requires local exchange
11 companies to implement intraLATA presubscription. Tennessee law also
12 requires telecommunications service providers to provide features,
13 functions, and services promptly and on a non-discriminatory basis.
14 T.C.A. Section 65-4-124 (a).

15

16 **Q. DOES THE ACT HAVE A TIMELINE FOR THE**
17 **IMPLEMENTATION OF INTRALATA PRESUBSCRIPTION?**

18

19 A. The Telecommunications Act requires local exchange companies to
20 implement intraLATA presubscription, but is not date specific. The FCC
21 Order addressing dialing parity, released August 8, 1996, orders all LECs

1 who currently provide or are planning to provide in-region interLATA toll
2 service to implement intraLATA toll dialing parity no later than August
3 8, 1997. However, Tennessee law requires that telecommunications
4 service providers furnish access to features, functions, and services
5 promptly.

6

7 **Q. WHY DOES AT&T FEEL THE TENNESSEE REGULATORY**
8 **AUTHORITY SHOULD ADDRESS INTRALATA**
9 **PRESUBSCRIPTION IN SPRINT UNITED TERRITORY?**

10

11 A. If Sprint United were allowed to provide interLATA service while not
12 implementing intraLATA presubscription until August, 1997, the intent
13 of the Telecommunications Act of 1996 and Tennessee law will be
14 frustrated. The Telecommunications Act is designed to promote
15 competition in the telecommunications industry, neither assisting nor
16 hindering specific competitors. Tennessee law similarly promotes
17 competition in the telecommunications industry and prohibits
18 unreasonable prejudice to any telecommunications services provider.
19 T.C.A. Section 65-4-123 (a). The intent of both statutes is to require fair,
20 free and effective competition be implemented. It is discriminatory and
21 anti-competitive for United to provide packaged local, 1+ intraLATA

1 service and 1+ interLATA service while at the same time denying its
2 competitors 1+ intraLATA equal access. Allowing Sprint United to
3 provide 1+ interLATA and 1+ intraLATA services now, while denying its
4 competitors the ability to provide 1+ interLATA and 1+ intraLATA
5 services until August 1997 would give Sprint United nearly a one year
6 head start. Giving Sprint United this one year advantage would violate
7 the non-discrimination requirements of the Act as well as Tennessee's
8 requirement of prompt provision of features, functions, and services on a
9 non-discriminatory basis. Sprint United should not be allowed to use its
10 monopoly position to throw up roadblocks to potential competitors.

11
12 **Q. WHAT ACTIONS DOES AT&T REQUEST THE TENNESSEE**
13 **REGULATORY AUTHORITY TO TAKE?**

14
15 A. AT&T requests the Tennessee Regulatory Authority to require Sprint
16 United to fully implement intraLATA presubscription as a condition to its
17 provision of interLATA services.

18
19 **Q. HOW DOES AT&T RECOMMEND THAT THE TENNESSEE**
20 **REGULATORY AUTHORITY ACCOMPLISH THIS?**

21
22 A. AT&T suggests that in order to provide dialing parity without delaying
23 Sprint United's entry into the interLATA market, as Sprint United's

1 offices are converted to 1+ intraLATA equal access, Sprint United then be
2 allowed to provide interLATA services to customers served by those
3 offices.

4

5 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

6

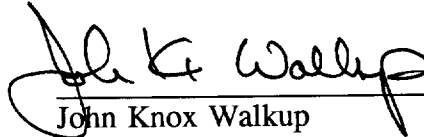
7 **A. Yes.**

CERTIFICATE OF SERVICE

I, John Knox Walkup, hereby certify that a copy of the foregoing Testimony has been served on the following parties of record by depositing a copy of the same in U.S. Mail, postage prepaid, addressed to them, this 10th day of September, 1996:

James B. Wright, Esq.
United-Telephone Southeast, Inc.
14111 Capital Boulevard
Wake Forest, NC 27586-5900

Dianne Neal, Esq.
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201




John Knox Walkup

BEFORE THE TENNESSEE REGULATORY AUTHORITY


STATE OF GEORGIA
COUNTY OF FULTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Richard Guepe who, being by me first duly sworn deposed and said that:

He is appearing as a witness for AT&T Communications of the South Central States, Inc. before the State of Tennessee Regulatory Authority relating to Docket No. 96-01235 and if present before the Commission and duly sworn, his testimony would be set forth in the annexed transcript consisting of 4 pages and 0 exhibits.


Richard Guepe

SWORN TO AND SUBSCRIBED BEFORE ME
this 9th day of September 1996.


Notary Public

Notary Public, Fayette County, Georgia
My Commission Expires June 23, 1997

My commission expires _____